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Mr. Lester Snow
Executive Director
CalFed
1416 Ninth Street, Suite 1155
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Re: CalFed Workgroup and Core Element Integration

Dear Lester:

The recent "cross-over" meeting of the ecosystem and assurances workgroups illustrates a process towards integration that must be achieved for all CalFed components. Co-Chair Dunning rightly focused on "what is not working in the current system", not to place blame, but rather to "build a case" or help define what is needed in the "new entity" for ecosystem program implementation. As we have indicated in other forums, now is the time for all CalFed core elements to be integrated with one another at both the policy and technical levels. Without such "cross-over", it is unlikely that necessary review of beneficial and adverse impacts of each element upon the others will be known to any degree. Further, since integrated review cannot properly occur until each element is developed (again at both the policy and technical levels) to an equal degree, this will provide much needed impetus to raise all other CalFed core elements (water supply, levee stability, etc.) to the level of development and specificity enjoyed by the ecosystem element.

In this particular instance, the cross-over discussion of the ecosystem restoration and assurances components, with focus on the "new entity" to administer the ecosystem program leads to the following issues and questions:

Even defining the issue can be difficult. During the Ecosystem/Assurances meeting, terms used to describe problems associated with CalFed implementation included: coordination; consolidation; fragmentation; inefficiency; redundancy. Further, the need for multi media and jurisdictional management (no single entity currently has proper mission scope / emphasis or authority) was also indicated. The thought is that greater efficiencies of information transfer and decisionmaking is necessary. Related is the problem of "parochial protection" by particular agencies. This is however a different issue than a lack of necessary legal authority or mandate and something that CalFed was intended to mitigate.

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Again, even though the ecosystem element is the most highly developed and emphasized among the CalFed elements, its implementation problems are indicative of those that will be faced by all CalFed elements. An example of this relates to CVPIA implementation and integration with the CalFed program. We continue to be proponents of integrating CVPIA and CalFed activities, both to reduce redundancy and increase synergistic benefits, but also to ensure proper application of CVPIA resources towards CVP related ecological issues. As you know, the CVPIA mandates that its ecological benefit programs be executed in a manner that balances all Project needs, and that the impacts of the ecological programs upon other Project purposes be mitigated. This CVPIA balancing objective should serve as a model for CalFed program policy.

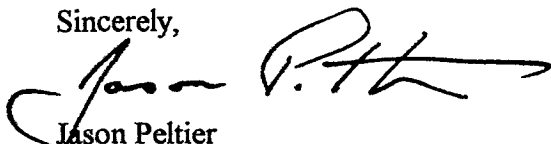
Towards accomplishing this sort of goal (balancing and program element integration), it was suggested during the meeting that the new ecosystem entity would perform a multi-faceted role as program architect, job foreman and laborer. What was and is missing with this and all CalFed program elements is a delineation of who bears the risk of failure; particularly where there is such centralized control of all aspects of program development and execution. In our view, authority and responsibility creates a correlative burden of risk such that those providing water and financial resources towards CalFed objectives cannot be viewed as a the universal insurance ("assurance"?) policy. Thus, even if a new entity is formed, there still must be an overarching CalFed entity that bears a balancing and integration responsibility.

It is critical to note that "eco management" while based on "science" cannot be fully insulated from public policy and CalFed mandated balance. Currently discussed "eco" "performance standards" are really policy assurances without necessary scientific underpinning. (Again, who bears the risk of imprudent program execution or mistakes of judgment?) The CalFed program must be implemented as a whole, with all objectives treated equally and cross-referenced in the planning and execution stages.

A truly comprehensive CalFed program using "adaptive management" principles would not only discuss "eco entity" needs relative to implementation and assurances, but would use adaptive management at a CalFed / multi-objective level to assess and reassess the relationship between activities undertaken under one CalFed program element and the positive and negative impacts of that activity upon execution and achievement of other CalFed element objectives. In a nutshell, not only must all CalFed objectives be equally emphasized at the policy and program levels, but the same treatment with regard to "assuring" proper execution, compliance and stakeholder support and participation is needed if the Program as a whole is to be properly launched and sustained.

The cross-over discussion between the ecosystem and assurances workgroups points the way, but also illuminates the chief weakness of the CalFed program as a whole. Only when all program elements are equally and more distinctly developed will we cease to "box at shadows" and become able to deal with program execution on a realistic rather than hypothetical basis, serving to lower both the thresholds of risk and costs of "assurance" -- ultimately leading to more expedient and certain achievement of CalFed objectives.

Sincerely,



Jason Peltier